

Defendant Agustin Francisco Huneeus respectfully moves the Court to modify his conditions of pre-trial release, which currently restrict his travel to the United States and require that he surrender his passport (which he has done).

Mr. Huneus is a vintner and has worked in the wine business almost his entire adult life. As a result of this case, Mr. Huneus will be restricted from certain business activities in the wine business in the United States, particularly those involving a liquor license. In an effort to find new work opportunities, he seeks permission to travel on business to Europe, as detailed herein from July 22, 2019 to August 6, 2019, to explore wine investment, marketing, and distribution opportunities with vineyards there. As a result of his decades of work in the wine industry, Mr. Huneus has a number of existing relationships with banks, wine sellers, winemakers and vineyard owners in France, Italy, and Portugal (and if he is permitted to make this trip would plan to meet with some or all of the individuals/entities as set forth below):

France – travel to Paris and Bordeaux to meet with, among others, representatives of a French bank, a wine consultant who has worked with the Huneeus family wine businesses for decades, the principal wine merchant in Bordeaux with whom Mr. Huneeus has worked for many years, and owners of certain wineries (7/22-7/29);

Italy – travel to Florence to meet with the family who owns a vineyard with whom Mr. Huneeus has done business in the past to discuss joint venture opportunities (7/30-8/1);

Portugal – travel to Lisbon and Porto to meet with wine producers to discuss joint ventures and new brand launch opportunities (8/2-8/6).

The above dates are as currently planned, but given the complexity of scheduling these numerous meetings with many different parties may be subject to slight variation by a day or two.

In order to pursue these business opportunities, Mr. Huneeus further requests that his passport be returned to him for the duration of that trip. Mr. Huneeus will keep U.S. Probation informed of his more detailed travel plans in advance of this proposed trip.

Mr. Huneeus is not a flight risk. He is a United States citizen and has resided in this country for nearly his entire life. He lives in California with his wife and school age daughters. He owns his home and substantial real estate holdings in California.

Mr. Huneeus has no criminal history. On May 21, 2019, further to a plea agreement, he pled guilty to one count of conspiracy to commit mail fraud, in violation of 18 U.S.C. § 1349. Mr. Huneeus' prompt decision to plead guilty shows that he has accepted responsibility for his

actions and is not a risk of flight. He has been fully compliant with his pre-trial conditions.

Mr. Huneus' undersigned counsel has conferred with the government about this motion, and the government has informed defense counsel that the government takes no position on this motion.

Dated: June 7, 2019

Respectfully submitted,

AGUSTIN FRANCISCO HUNEEUS

By his attorneys,

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CERTIFICATE OF SERVICE

I hereby certify that the foregoing document was served by ECF on counsel for the Government and on Probation Officer Martha Victoria by email on June 7, 2019.

/s/Jeremy M. Sternberg
Jeremy M. Sternberg